UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

12 Cr. 445 (JMF)

JUAN FERNANDEZ, ET AL.

DEFENDANT.

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PLEASE TAKE NOTICE, that upon the annexed declaration of Sarah Baumgartel, Esq. and the attached Exhibits and Memorandum of Law, the undersigned will move this Court, before the Honorable Jesse M. Furman, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York, at a time to be designated by the Court, for an order suppressing evidence obtained in violation of the United States Constitution, or granting an evidentiary hearing on this motion, and granting such further relief as the Court deems just and proper.

Dated: New York, New York November 28, 2012

Respectfully submitted, Federal Defenders of New York, Inc.

By:\_

SARAH BAUMGARTEL, ESQ. 52 Duane Street, 10th Floor New York, New York 10007

Tel.: (212) 417-8772